

1 Joseph R. Saveri (State Bar No. 130064)  
Steven N. Williams (State Bar No. 175489)  
2 James G. Dallal (State Bar No. 277826)  
Joshua P. Davis (State Bar No. 193254)  
3 Anupama K. Reddy (State Bar No. 324873)  
Christopher K.L. Young (State Bar No. 318371)  
4 **JOSEPH SAVERI LAW FIRM, INC.**  
601 California Street, Suite 1000  
5 San Francisco, California 94108  
Telephone: (415) 500-6800  
6 Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
7 swilliams@saverilawfirm.com  
jdallal@saverilawfirm.com  
8 jdavis@saverilawfirm.com  
areddy@saverilawfirm.com  
9 cyoung@saverilawfirm.com.com

10 *Lead Counsel for Direct Purchaser Class*

11 UNITED STATES DISTRICT COURT  
12  
13 NORTHERN DISTRICT OF CALIFORNIA

14 IN RE CAPACITORS ANTITRUST LITIGATION  
15 THIS DOCUMENT RELATES TO THE DIRECT  
16 PURCHASER CLASS ACTION

Master File No. 3:17-md-02801-JD  
Civil Action No. 3:14-cv-03264-JD

**DECLARATION OF JOSEPH R. SAVERI  
IN SUPPORT OF BRIEF RE:  
PLAINTIFFS' OPENING STATEMENT  
SLIDES**

Date: March 3, 2020  
Time: 8:30 a.m.  
Courtroom: 11, 19th Floor  
Judge: Honorable James Donato

1 I, Joseph R. Saveri, declare:

2 1. I am an attorney licensed in the State of California and admitted to practice in the  
3 Northern District of California. I am the founder of the Joseph Saveri Law Firm, Inc., Class Counsel  
4 for the Direct Purchaser Class (the “Class”) in this action. I have handled this action since its  
5 inception. Unless otherwise indicated, I have personal knowledge of the facts set forth herein. If called  
6 as a witness, I could and would testify competently to them. I make this declaration pursuant to 28  
7 U.S.C. § 1746.

8 2. This declaration is submitted in support of Brief Re: Plaintiffs’ Opening Statement  
9 Slides.

10 3. Attached hereto is a true and correct copy of **Trial Exhibit 112**, bates numbered  
11 MATSUO 00000420 through MATSUO 00000422, produced by MATSUO ELECTRIC COMPANY  
12 LIMITED (“MATSUO”) in this litigation, followed by a certified translation of the same document  
13 from Japanese to English, Bates numbered MATSUO 00000420-CT001 through MATSUO  
14 00000420-CT003.

15 4. Attached hereto is a true and correct copy of **Trial Exhibit 117**, Bates numbered  
16 MATSUO 00000458 through MATSUO 00000465, produced by MATSUO in this litigation, followed  
17 by a certified translation of the same document from Japanese to English, Bates numbered MATSUO  
18 00000458-CT001 through MATSUO 00000458-CT008.

19 5. Attached hereto is a true and correct copy of **Trial Exhibit 2397**, Bates numbered  
20 ELNA\_NDCAL-00046868 through ELNA\_NDCAL-00046870, produced by ELNA CO., LTD. and  
21 ELNA AMERICA, INC. (collectively “ELNA”) in this litigation, followed by a certified translation of  
22 the same document from Japanese to English, Bates numbered ELNA\_NDCAL-00046868\_EN  
23 through ELNA\_NDCAL-00046870\_EN.

24 6. Attached hereto is a true and correct copy of **Trial Exhibit 8316**, Bates numbered  
25 RUB\_003328943, produced by RUBYCON CORPORATION and RUBYCON AMERICA INC.  
26 (collectively “RUBYCON”) in this litigation, followed by a certified translation of the same document  
27 from Japanese to English, Bates RUB\_003328943\_CT0001.  
28

By: /s/ Joseph R. Saveri  
Joseph R. Saveri